

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK**

NEW YORK STATE RIFLE & PISTOL)
ASSOCIATION, INC., *et al.*,)
)
 Plaintiffs,)
) Civil Action No. 18-cv-134-BKS-ATB
v.)
)
GEORGE P. BEACH II, *et al.*,)
)
 Defendants.)

**PLAINTIFFS' UNOPPOSED MOTION FOR
LEAVE TO AMEND COMPLAINT**

Pursuant to FED. R. CIV. P. 15 and 21 and Local Rule 7.1(a)(4), and for the reasons articulated in the accompanying Affidavit and Memorandum, Plaintiffs on June 28, 2018, or as soon thereafter as counsel can be heard, will respectfully move this Court for leave to amend their Complaint in this action to add Mr. Brandon Koch as an additional plaintiff. An unsigned copy of the proposed Amended Complaint is attached as Attachment A. A redline version of the Amended Complaint showing the amendments Plaintiffs seek to make from the current operative Complaint is attached as Attachment B.

Plaintiffs have consulted with counsel for the defendants concerning this motion, and the defendants do not oppose it.

Dated: May 15, 2018

David H. Thompson*
Peter A. Patterson*
John D. Ohlendorf*
COOPER & KIRK, PLLC
1523 New Hampshire Avenue, N.W.
Washington, D.C. 20036
(202) 220-9600
(202) 220-9601 (fax)
dthompson@cooperkirk.com

*Appearing *pro hac vice*

Respectfully submitted,

s/ Kathleen McCaffrey Baynes
Kathleen McCaffrey Baynes, Bar Roll No. 507154
KATHLEEN McCAFFREY BAYNES, ESQ., PLLC
Attorney of Record
21 Everett Road Extension, Suite A-4
Albany, NY 12205
(518) 489-1098
kmb@kmbaynes.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on May 15, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will cause a copy of the document to be served electronically on all parties or their counsel.

s/ *Kathleen McCaffrey Baynes*
Kathleen McCaffrey Baynes

Attorney for Plaintiffs